

EXHIBIT D

Vladimir Iakovlev, M.D.

1 IN RE: PELVIC MESH LITIGATION PHILADELPHIA COUNTY
2 -----X COURT OF COMMON PLEAS
3 Sharon Carlino and : TRIAL DIVISION - CIVIL
4 Charles Carlino, :
5 Plaintiffs, : JUNE TERM 2013
6 V. :
7 Ethicon, Inc., et al., : No. 3470
8 Defendants. :
9 -----X

10

11

12

13 Toronto, Ontario, Canada

14 Thursday, November 5, 2015

15

16

17 Deposition of VLADIMIR IAKOVLEV,
18 M.D., a witness herein, called for examination
19 by counsel for the Defense, in the above-mentioned
20 matter, the witness having been duly sworn, taken
21 at the Shangri-La Hotel, 188 University Avenue,
22 Toronto, Ontario, Canada commencing at 9:20 a.m.
23 on November 5, 2015, and the proceedings taken
24 by JUDITH M. CAPUTO, RPR, CSR, CRR.

Vladimir Iakovlev, M.D.

1 nerve density was much higher. Of course we had
2 some neuromas, but not all of them had neuromas,
3 just higher in their density.

4 (Reporter sought clarification).

5 A. Some of them just had pain and
6 high nerve density.

7 Q. Dr. Iakovlev, what are the various
8 types of nerve receptors?

9 A. Well, either we're talking about
10 pain receptors, and then we're talking about other
11 receptors, like temperature, touch, vibration.

12 Q. What are the pain receptors?

13 A. Pain receptors are usually just
14 bare endings of the nerves.

15 Q. And what are they called?

16 A. Nociceptors.

17 Q. And what is the prevalence of
18 nociceptors in the interior vaginal wall?

19 A. What do you mean "prevalence"?

20 Q. What is the prevalence?

21 A. What's the density?

22 Q. Okay. What is the density?

23 A. I don't know. It's there. I
24 mean, that's why we can sense -- I think we're

Vladimir Iakovlev, M.D.

1 Q. And those would be within what you
2 have described as a scar plate?

3 A. Yes.

4 Q. The nerve fibers that you've
5 identified on SC-6, are those coming from a
6 peripheral nerve?

7 A. What do you mean? They're all
8 peripheral nerves. You mean autonomous or --

9 Are you asking about peripheral nerve
10 system versus autonomous?

11 Q. Yes.

12 A. That's difficult question.
13 Because some of the parts of the autonomous nerve
14 system are myelinated, so they will be stained by
15 some kind of stain.

16 In any case, autonomous or
17 nonautonomous, they are combination of motor and
18 sensory, both.

19 Q. You don't know whether that is a
20 peripheral or autonomic nerve, do you?

21 A. As I said, some of them could be
22 either.

23 Q. But you can't --

24 A. No, I cannot separate them, no,

Vladimir Iakovlev, M.D.

1 that's true. But autonomous nervous system also
2 conduct pain, otherwise, you wouldn't feel pain in
3 the internal organs. So it doesn't matter what
4 type of neuro system they coming from, they can
5 deliver pain sensation; that's the main reason.

6 Q. What nerve are these fibers
7 branching from?

8 A. That would be impossible to trace.
9 I mean, they are just small branches.

10 Q. And you do not know what nerve
11 they --

12 A. They don't have names. They are
13 so small, they don't have any names.

14 Q. And do you know what nerve they
15 ultimately branch from?

16 A. No.

17 Q. For any of the nerves that are set
18 forth on SC-6 through SC-11, you cannot tell us
19 whether that is a sensory nerve, can you?

20 A. I can tell you one thing. It
21 doesn't matter what nervous system they coming
22 from, what nerves they coming from. Some of them
23 will be delivering sensation; it's unavoidable.

24 Q. So here is my question: For the

Vladimir Iakovlev, M.D.

1 CERTIFICATE OF REPORTER

2 CANADA)

3 PROVINCE OF ONTARIO)

4

5 I, Judith M. Caputo, the officer before whom the
6 foregoing deposition was taken, do hereby certify
7 that the witness whose testimony appears in the
8 foregoing deposition was duly sworn by me; that the
9 testimony of said witness was taken by me in
10 shorthand, using Computer Aided Realtime, to the
11 best of my ability and thereafter reduced to
12 written format under my direction; that I am
13 neither counsel for, related to, nor employed by
14 any of the parties to the action in which the
15 deposition was taken, and further that I am not
16 related or any employee of any attorney or counsel
17 employed by the parties thereto, nor financially or
18 otherwise interested in the outcome of the action.

19

20

21 _____
Judith M. Caputo, RPR, CSR, CRR

22

23 Commissioner for taking

24 Oaths in the Province of Ontario